

Exhibit Z

Doug Fleurant
February 21, 2024

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MASSACHUSETTS

3 CASE NO. 1:23-CV-11085-RGS

4 PREPARED FOOD PHOTOS, INC.
f/k/a ADLIFE MARKETING &
5 COMMUNICATIONS CO., INC.,
Plaintiff,

6 v.

7 WENEEDAVACATION.COM, LLC

8

9 Defendant.

10 _____ /

11

12

13

14 REMOTE DEPOSITION OF

15 DOUG FLEURANT

16 VOLUME 1 (Pages 1 - 20)

17

18 February 21, 2024
11:03 a.m. - 11:22 a.m.

19

20 LOCATION: Remote via Zoom
Pawtucket, Rhode Island

21

22 Reported by: Bridgitt Myers,
Cert No. CDR-2895.

23

24

25 Job No.: 350281

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1 A. No specific plan short of just trying to
2 protect our property.

3 Q. Why did PFP decide to start to pursue
4 infringers?

5 A. Revenues associated with licensing dropped
6 considerably and we realized it's because people were
7 stealing the images as opposed to licensing them.

8 Q. Was there any analysis done on the profits that
9 could be earned for IP infringement or, sorry, for IP
10 enforcement?

11 A. No, the goal was to just cease the, the illegal
12 use, the unauthorized use.

13 Q. Did that goal change at any point in time?

14 A. No. To this day, our goal is to prevent the
15 unlicensed use and to try to increase the licensing.

16 Q. And it's my understanding that PFP earns
17 approximately 120,000 from its licensing each year. How
18 does it support its business without the IP enforcement
19 revenue?

20 A. The costs -- the costs associated with the
21 licensing are minimal. The library is in place, so the
22 only expense, basically, is the software required to run
23 the subscription service.

24 Q. And so the rest of the employees that work for
25 PFP primarily run the IP enforcement section of the

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1 company?

2 A. Manage or work for, yes.

3 Q. And has there ever been any discussion
4 surrounding the financial benefits of pursuing
5 infringements?

6 A. There is a financial benefit, but that was not
7 the point of any discussion. Any discussion was to
8 prevent the unlicensed use, whatever we had to do to
9 protect our rights and cease that unlicensed use.

10 Q. Has it ever been too expensive to pursue
11 infringers?

12 A. We have not recognized that yet, no.

13 Q. And so I'll move at that -- at this point to
14 topic two, which is regarding the profits or revenues
15 made from the monthly subscriptions versus the IP
16 enforcement revenues. Have you had any discussions
17 regarding this topic, other than with your attorney,
18 within PFP?

19 A. Could you restate the question, just to be sure
20 I understand it properly?

21 Q. Sure. I don't want to get into anything you
22 discussed with your attorney. But to prepare for this
23 topic, did you have any discussions with anyone else in
24 PFP?

25 A. No. To prepare for this deposition, I did not.